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*Attorneys for Defendants*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

PETER DELVECCHIA, individually and as  
next friend of A.D., a Minor,

*Plaintiffs,*

v.

FRONTIER AIRLINES, INC., SCOTT  
WARREN, CHELSIE BRIGHT SAKURADA,  
ANNA BOND, AMANDA NICKEL,  
REX SHUPE and SHAWN MULLIN

*Defendants.*

Case No.: 2:19-cv-01322-KJD-DJA

**FRONTIER AIRLINES, INC.'S  
UNOPPOSED MOTION FOR  
EXTENSION TO FILE ITS REPLY**

**DEFENDANT FRONTIER AIRLINES, INC.'S UNOPPOSED MOTION FOR AN EXTENSION  
TO FILE ITS REPLY IN SUPPORT OF ITS MOTION FOR PROTECTIVE ORDER**

Defendant FRONTIER AIRLINES, INC. ("Frontier"), by its undersigned counsel, and for its unopposed Motion seeking an extension of seven (7) days, or until December 2, 2022, to file its reply in support of its Motion for Protective Order (ECF No. 215), states:

On November 3, 2022, Frontier filed a Motion for Protective Order (ECF No. 215) related to Plaintiffs' Fifth Amended Rule 30(b)(6) Deposition Notice and the topics listed therein. On November

17, 2022, Plaintiffs filed their response to Frontier's Motion for Protective Order (ECF No. 217). Pursuant to Federal Rule of Civil Procedure 6 and Local Rule 7-2, Frontier's deadline to file its Reply is November 25, 2022, the day after Thanksgiving.

Given the timing of the current deadline, Frontier respectfully requests that its deadline to file its reply be extended seven (7) days, or until December 2, 2022. Plaintiffs' counsel has represented that Plaintiffs do not oppose this motion.

WHEREFORE, Defendant, Frontier Airlines, Inc. requests that this Court grant its unopposed motion seeking an extension of seven (7) days, or until December 2, 2022, to file its reply in support of its Motion for Protective Order.

DATED this 22<sup>nd</sup> Day of November 2022

Respectfully submitted,

**FRONTIER AIRLINES, INC.**

/s/Brian T. Maye

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 22, 2022, I caused the foregoing to be electronically filed with the United States District Court for the District of Nevada using the CM/ECF system.

/s/Brian T. Maye